

Mendiola, Doris

Subject: FW: Transmittal of the PWROG Comments on the Draft Guidance Regarding the Alternate Pressurized Thermal Shock Rule (DG-1299)
Attachments: OG-15-193.docx; Comments on Draft Regulatory Guide DG-1299_PWROG.DOC

3/13/2015

80 FR 13449

From: Molkenthin, James P [molkenjp@westinghouse.com]

Sent: Tuesday, May 12, 2015 2:40 PM

To: Stevens, Gary; Kirk, Mark; Burton, Stephen

Cc: 'Heather Malikowski'; Koehler, Christopher R.; 'Jim Nurrenbern'; Hall, J. Brian

Subject: Transmittal of the PWROG Comments on the Draft Guidance Regarding the Alternate Pressurized Thermal Shock Rule (DG-1299)

2

Gary, Mark and Stephen,

Please find attached the PWROG comments on the "Draft Guidance Regarding the Alternate Pressurized Thermal Shock Rule (DG-1299)." Can you please forward them to Cindy Bladey, her email address was not provided.

For technical questions regarding the enclosed PWROG comments, please contact Brian Hall (Westinghouse) at (412) 342-1916. If you have any additional questions or comments on the enclosed information, feel free to contact me in the PWROG office at (860) 731-6727.

Regards,

Jim Molkenthin

Program Director

Materials Committee • Analysis Committee

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Template = ADM - 013

E-RIDS= ADM-03

Add= B. Stevens (gls4)

M. Kirk (mtk)
S. Niquita (sxb3)



Program Management Office
20 International Drive
Windsor, Connecticut 06095

May 12, 2015

OG-15-193

Ms. Cindy Bladey
Office of Administration,
Mail Stop: OWFN-12-H08,
U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001

Subject: PWR Owners Group
**Transmittal of the PWROG Comments on the Draft Guidance Regarding the
Alternate Pressurized Thermal Shock Rule (DG-1299)**

Enclosed are the PWROG comments on the "Draft Guidance Regarding the Alternate Pressurized Thermal Shock Rule (DG-1299)."

For technical questions regarding the enclosed PWROG comments, please contact Brian Hall (Westinghouse) at (412) 342-1916.

If you have any additional questions or comments on the enclosed information, feel free to contact Jim Molkenthin in the PWROG office at (860) 731-6727.

Sincerely,

J. Molkenthin Approving for J. Stringfellow

Jack Stringfellow
Chief Operating Officer & Chairman
Pressurized Water Reactor Owners Group

NJS:JPM:las

Enclosures: (1) PWROG Comments on Draft Regulatory Guide DG-1299 "Regulatory Guidance on the Alternate Pressurized Thermal Shock Rule"

cc: PWROG Management Committee
PWROG Materials Committee
PWROG PMO
A. Freed, W
W. Bamford, W
J. Andrachek, W
B. Hall, W
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A. Nana, AREVA Inc.
Jonathan Rowley, NRC

PWROG Comments on Draft Regulatory Guide DG-1299
“Regulatory Guidance on the Alternate Pressurized Thermal Shock Rule”

ID	Section, Page, and Line #	Comment	Proposed Resolution
1	General	Guidance on Equation (5) limitations/use parameters are not stated in DG-1299.	Add wording similar to NUREG-2163 on using caution when applying the equation to conditions near to or beyond the 5 extremes of its calibration dataset. Could also include information in Table 5 of NUREG-2163 in the Reg. Guide itself.
2	Page 3, #1	Editorial error on line 9 of item #1.	“10 CFR 50.61a criteria Such applicants”
3	Page 6, Step 1, (a)	“For each shell material in the RPV beltline region, identify all surveillance data from the plant being assessed and from any other reactor that is operating, or has previously operated, under a license issued by the NRC that is of the same heat of material.”	Inclusion of BWR capsule data for the purposes of assessing materials in PWR plants typically does not provide relevant results due to the lower accrued fluence/flux in BWR environments. Recommend replacing “reactor” with “PWR.”
4	Page 7, Step 1, (c)	NRC lists “Charpy-V notch energy data used to estimate DT30” as an item to be assembled.	The energy data is not essential information for the purposes of performing the statistical analysis, just the resulting DT30.

5	Page 7, Step 1, (c)	T _c is defined as the time-weighted average “from the start of full power operation through the end of licensed operation.”	This definition is consistent with the one provided in 10 CFR 50.61a, however, for the purposes of the statistical check, this definition is not entirely appropriate. It would not be appropriate to apply a time weighted temperature for the entire operation of the plant on a surveillance capsule that was not subjected to that environment. T _c should be defined as the time weighted average coolant temperature of the reactor coolant system cool leg covering the inservice operation time that a surveillance capsule is subjected to.
6	Page 7, T _c bullet	Difference between time-weighted temperature vs. pure average (mean) temperature has been found to be quite minimal for plants analyzed to date.	Practical observation.